

## CHLORPYRIFOS

**ISSUE/TOPIC:** Status of Chlorpyrifos in the pesticide re-evaluation process

### BACKGROUND:

- In September 2007, the Pesticide Action Network of North America (PANNA) and Natural Resources Defense Council (NRDC) submitted a petition seeking revocation of all tolerances and cancellation of all Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) registrations of products containing the insecticide chlorpyrifos.
- Through the pesticide re-evaluation program, the EPA conducted risk assessments in 2011, 2014, and 2015 that incorporated methodologies as the science has advanced. In October 2015, the EPA proposed to revoke all food residue tolerances for chlorpyrifos.
- The EPA took most of the complex and novel science questions raised in the petition to the FIFRA Scientific Advisory Panel (SAP) for review several times. Specifically, the EPA requested the SAP to review new worker and non-occupational exposure methods, experimental toxicology and epidemiology, risk assessment approaches for semi-volatile pesticides, and the evaluation of a pharmacokinetic-pharmacodynamic model.
- Accomplishments:
  - Considering SAP's recommendations, the EPA issued a Notice of Data Availability in November 2016 on a revised human health risk assessment.
  - The EPA issued the order denying the PANNA-NRDC petition on March 29, 2017, based on scientific uncertainty.
  - In January 2017, the EPA initiated formal consultation under the Endangered Species Act with the US Fish and Wildlife Service and the National Marine Fisheries Service.
- Congressional Inquiries. In a letter to Administrator Pruitt on March 31, 2017, Senator Carper requested copies of pertinent documents related to the EPA's petition denial. In late April, Senator Warren and Rep. Pallone sent a letter to the EPA Inspector General asking for an investigation into the agency's decision to deny the PANNA-NRDC petition.

### TALKING POINTS:

- On March 29, 2017, the EPA issued an order denying a petition requesting that the EPA revoke all tolerances and cancel all chlorpyrifos registrations under FIFRA. USDA scientists supported this determination. The EPA intends to complete the registration review of chlorpyrifos by October 1, 2022.
- Despite several years of study, the EPA concluded that the science addressing neurodevelopment effects remains unresolved and that further evaluation of the science during the remaining time for completion of registration review is warranted.
- The Draft Biological Opinion for chlorpyrifos (as well as malathion and diazinon), are expected from the Services in May 2017. The Final Biological Opinions are due in December 2017.

